

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

MAX MINDS, LLC,

Plaintiff,

v.

TRIANGLE EXPERIENCE GROUP, INC.,
ROBERT CLARE, JEFFREY MASE,
KEVIN MULLICAN, and JOHN DOES 1-10,

Defendants.

CAUSE NO. 1:24-cv-00779-JPH-MG

JURY TRIAL DEMANDED

[PROPOSED] STIPULATED SCHEDULE FOR PRELIMINARY INJUNCTION

Plaintiff MAX MINDS, LLC (“Plaintiff”), and defendant, TRIANGLE EXPERIENCE GROUP, INC. (“TEG”), by and through undersigned counsel, hereby stipulate and agree to the entry of the following schedule for Plaintiff’s Motion for Preliminary Injunction and Seizure Order:

1. All discovery in this matter must be narrowly tailored to only the allegations raised in Plaintiff’s currently pending Motion for Preliminary Injunction and Seizure Order.
2. **Written Discovery.** Beginning immediately and through June 10, 2024, the Plaintiff and TEG may propound the following written discovery on the other, which may be validly served by email to counsel of record in the case. The limits indicated below are per side of the case. The days are calendar days except that dates that fall on a Saturday, Sunday or legal holiday continue to run until the next day that is not a Saturday, Sunday or legal holiday. The parties may agree to extensions in writing of seven or fewer days without Court approval.
 - a. Up to ten (10) interrogatories pursuant to Fed. R. Civ. P. 33 per side.
 - b. Up to twenty (20) requests for production pursuant to Fed. R. Civ. P. 34 per side.

- c. Up to ten (10) requests for admission on any topic pursuant to Fed. R. Civ. P. 36 per side and an additional twenty (20) requests for admission for document authentication per side.
- d. Time for Responses: Each party has 10 days from the date of service to respond and object to the requests. After responding, the parties shall meet and confer to narrow and attempt to resolve any objections by telephone or video conference within ten (10) days after the responses and objections are served. Production of documents and provision of written responses must begin before the expiration of thirty (30) days from the date of service of each request, and must conclude before the expiration of forty (40) days from the date of service of each request.

3. **Depositions:** Depositions may be noticed and taken with the agreement of all parties beginning on July 15, 2024 and without mutual agreement on July 22, 2024 and continuing through August 9, 2024. Each party is limited to three non-expert depositions. The parties will exchange available dates for counsel and proposed deponents at least ten (10) days prior to noticing a deposition. Depositions will be taken by remote video and limited to no more than 3.5 hours on the record. The party taking the deposition will provide the exhibits to be used electronically to the other side before the deposition begins.

4. **Experts:** If either party intends to present expert testimony at the hearing on Plaintiff's Motion for Preliminary Injunction and Seizure Order, the party or parties intending to present expert testimony on or before August 16, 2024 will serve a notice identifying the expert, summarizing the expert's opinions and proposed testimony, and attaching the expert's CV. Between August 19, 2024 and August 30, 2024, each party is entitled to depose the other party's expert witness for a period of no longer than 3.5 hours on the record. The expert's direct

testimony at the hearing will be confined to the opinions and proposed testimony in the expert's notice, subject to the limitations in paragraph 1 above. The parties agree to limit expert witnesses to one per side. If any party seeks to take an in person deposition of an expert witness, and the other side objects, the parties will endeavor to reach an agreement, but barring such an agreement in person depositions of experts may be taken where the expert's home or office is located.

5. **Defendants' Response to Motion.** The Defendants shall serve and file their responsive brief to the Plaintiff's Motion for Preliminary Injunction and Seizure Order on or before September 13, 2024.

6. **Plaintiff's Reply.** The Plaintiff shall serve and file its reply brief two weeks after the defendants serve their opposition brief.

7. **Status Report.** Two weeks after the plaintiff files its reply brief the parties' will file a joint status report providing the court with at least ten (10) mutually agreed upon and available dates for a single day hearing to be held in the ninety (90) day period following the filing of the pre-hearing statement.

8. **Pre-Hearing Statement.** Fifteen days prior to the date set for the hearing by the court, the parties shall file either a joint pre-hearing statement or individual pre-hearing statements as the Court determines, containing stipulations of fact and law, disputed issues of fact and law for determination by the court, and the parties' respective witness and exhibit lists.

Dated:

SO STIPULATED:

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*Counsel for Defendants Triangle Experience
Group, Inc.,*

IT IS SO ORDERED:

Signed this ____ day of _____, 2024.

By _____
Mario Garcia
United States Magistrate Judge
Southern District of Indiana